



Department of Energy
 Carlsbad Field Office
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 Carlsbad, New Mexico 88221

OCT 8 2013

Mr. D. E. Gulbransen, Manager
 National TRU Program Certification
 Nuclear Waste Partnership, LLC
 P. O. Box 2078
 Carlsbad, New Mexico 88221-2078

Subject: Review and Verification of the Corrective Actions Submitted in Response to and Closure of CBFO CAR 13-036

Dear Mr. Gulbransen:

The Carlsbad Field Office (CBFO) has completed review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 13-036, which resulted from CBFO Surveillance S-13-23, Concern Classification Evaluation, effected by CAR 13-023. The results of the verification are documented on the enclosed CAR Continuation Sheet, and indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 13-036 is considered closed.

If you have any questions concerning the closure of CAR 13-036, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 13-036

2. Activity No: S-13-23

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Block # 17 Acceptance of Corrective Action Completion:

The Carlsbad Field Office (CBFO) has performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 13-036, identified during CBFO Surveillance S-13-23, Concern Classification Evaluation, effected by CAR 13-023. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:13:01407 UFC:2300.00, dated September 24, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification (NTPC), to Mr. Dennis S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office. The methods used to verify completion of the actions contained in the approved corrective action plan (CAP) are described below.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

For reasons discussed in the Impact section of this Corrective Action Plan, NTPC has determined that no Remedial Actions are required for the CAR condition.

Verification:

The justification for not performing remedial actions was deemed appropriate and acceptable in the corrective action plan approval.

INVESTIGATIVE ACTIONS

Condition 1.0*Extent*

The condition is limited to RH VE BDRs at SNL. At INL and ANL, RH VE operators have reported either "heat sealed filtered" or "N/A," as applicable for the specific containers being characterized (some containers have zero layers of confinement.

Impact

Each closure method in Table 2.5-1 is associated with a diffusivity that is calculated by the transportation group, to ensure that the right TRUCON code will be applied to the waste. For RH, each TRUCON code is developed using the information in the AK Summary Report and the scaling factors developed by the radiological engineer (unlike CH, the RH TRUCON codes are waste stream-specific). Because each RH TRUCON code is tailored to one RH waste stream, it is based on the diffusivities for the closure methods identified in AK for that waste stream, the TRUCON code will ensure that the shipment will meet the transportation requirements. The only way that a closure method could affect the TRUCON code would be if a Host location was using some new closure method that had not been covered in AK. This was not the case at Sandia; to date, RH has not used a closure method that was not listed in AK at any Host location. For the above reasons, there is no impact from this CAR condition.

Condition 2.0

Headspace Gas (HSG) Sampling is performed in accordance with CCP-TP-093, CCP Sampling of TRU Waste Containers. CCP-TP-106 governs the preparation of HSG BDRS, using the data collected in accordance with CCP-TP-093. The relationship between the two procedures is stated in CCP-TP-106 as follows:

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Condition 2.0

The information on how to obtain 72-hour equilibration plots is clearly stated in procedure CCP-TP-106 (they come from CCP-TP-093). Both procedures are now obsolete, in response to the removal of chemical sampling from the NTPC program, following a March 13, 2013, modification to the Hazardous Waste Facility Permit.

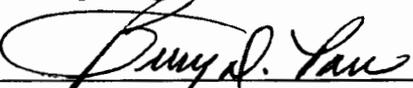
For the above reasons, no actions to prevent recurrence are necessary for Condition 2.0.

Verification:

A review of the revision to CCP-TP-500 (Rev. 13) concluded that the action to preclude recurrence for condition 1 has been fulfilled. The justification for not implementing corrective actions for condition 2 is deemed appropriate and was accepted with the approval of the CAP.

ACCEPTANCE

Based on the results of the review of the objective evidence included in the CAR 13-036 closure package, it is recommended that CAR 13-036 be closed.


Verification Performed By: Berry D. Pace

9/25/13
Date

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"This procedure [CCP-TP-106] applies to personnel responsible for TRU waste container HSG Sampling BDR preparation and performance of data generation level reviews for sampling activities associated with CCP-TP-093, CCP Sampling of TRU Waste Containers." [Section 1.1]

"Records generated in procedure CCP-TP-093...are included as part of the compilation of the Sampling BDR, AND are listed in Attachment 2." [Section 5.1]

Attachment 2 to CCP-TP-106 is the template for the Table of Contents for the HSG Sampling Batch Data Report: Section 11.0 of the Table of Contents is "72-Hour Temperature Equilibration Plots."

The 72-hour equilibration time is discussed extensively in CCP-TP-093, and the form that requires the information to be documented is Attachment 2, page 2, from CCP-TP-093. The completed form becomes part of the sampling BDR in accordance with Section 11.0 of the Table of Contents: "Sample Drum Data Form (Attachment w from CCP-TP-093.)"

Extent

The condition applies to all HSG Sampling BDRs prepared in accordance with CCP-TP-106.

Impact

The information on how to obtain the 72-hour equilibration plots is clearly stated in CCP-TP-106 (see the sections quoted above). There is no impact from the Condition 2.0.

There is the further consideration that both CCP-TP-093 and CCP-TP-106 are now obsolete, in response to the removal of chemical sampling from the NTPC program, following a March 13, 2013, modification to the Hazardous Waste Facility Permit.

Verification:

A review of the extent and impact conclusions reached by NTPC during the investigative actions for both conditions is determined to be appropriate.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

Condition 1.0

NTPC will revise CCP-TP-500 to define approved closure methods for layers of confinement for containers for RH containers; the revision will incorporate the information currently in CCP-TP-113, Table 2, into CCP-TP-500.